

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):	Randall E. Juenger		
Assignee:	Dell Products L.P.		
Title:	System and Method for DVI Native and Docking Support		
Serial No.:	10/689,253	Filed:	October 20, 2003
Examiner:	Matthew D. Spittle	Group Art Unit:	2111
Docket No.:	DC-05519	Customer No.:	33438

Austin, Texas
April 16, 2008

Electronically Filed

REPLY BRIEF UNDER 37 CFR § 1.193

Dear Sir:

Applicants submit this Reply Brief pursuant to the Examiner's Answer mailed in this case on March 17, 2008. It is believed that no fees are due in connection with the filing of this Reply Brief, however, the Commissioner is authorized to deduct any amounts required for this Reply Brief and to credit any amounts overpaid to Deposit Account No.502264.

Applicant respectfully requests reversal of the rejections of Claims 1-8 and examination and allowance of Claims 9-22. Although Claims 9-22 are similar to Claims 1-8, they are not identical. Applicant is entitled to a fair examination of Claims 9-22 or at least a review of the recited elements that differ between the claims. As an example, Applicant requests that the Board consider the language of Claim 9 which recites "selectively providing the DVO signal to one of a first or a second TMDS transmitter" and "transmitting display information from the second TMDS transmitter to a DVI connector *coupled to a docking station*." The Examiner has emphasized with respect to the rejection of Claim 1 that the PC card is a docking connector, not a docking station. The Examiner's rejection of Claim 1 is inconsistent with the Examiner's rejection of Claim 9, which recites that the DVI connector is coupled to a docking station. Had the Examiner in fact examined Claim 9, Applicant would have had an opportunity to point out this and other inconsistencies.

The Examiner's rejection of Claim 1 fails to establish several elements recited by Claim 1 in the prior art relied upon by the Examiner. First the Examiner suggests that the SideCar Plus Two Unit is a docking station. Applicant respectfully traverses. The SideCar device interfaces through an external cable and a PCMCIA card, and thus does not provide the structure of a docking station as commonly understood in the art and as depicted in Applicant's drawings. Nakamura does not support the Examiner's rejection as Nakamura addresses electrical interfaces and not the physical connection of a portable information handling system and docking station. Further, the Examiner offers no evidence that the output of the PCMCIA card (the Examiner's docking connector) provides a DVI output to the SideCar device (the Examiner's docking station). The cable on page 13 connects the SideCar device to a monitor, not the PCMCIA card to the SideCar device. *See, e.g.* page 16 for a list of SideCar hardware.

The Examiner now admits that Acharya fails to explicitly disclose plural TMDS transmitters. The Examiner now relies upon the doctrine of inherency to state that "some sort of data transmission device is inherent to each graphics output on the notebook computer." Applicant respectfully traverses. In order to rely on the doctrine of inherency, the Examiner must establish that the recited elements are necessarily present. As set forth above, the SideCar device communicates with the information handling system through a PCMCIA card and cable. The Examiner offers no evidence that suggests the use of a TMDS transmitter in the transmission through the PCMCIA card. Thus, the Examiner cannot rely on the doctrine of inherency, which requires that the recited element necessarily be present.

The Examiner suggests that the SideCar reference at page 3 discloses a selector having first and second selectable outputs because displays 1 and/or 2 are enabled and disabled with Windows operating system display software. Applicant respectfully traverses. Nothing in the SideCar reference indicates how the selection between displays is managed. Applicant notes that the SideCar reference's emphasis on simultaneous presentation from multiple displays teaches away from a selector that sends a DVO signal to either a first or a second TMDS transmitter, as is recited by Claim 1. Accordingly, applicant respectfully requests that the Board reverse the Examiner's rejection of Claim 1.

For the above reasons, Applicants respectfully submits that the Examiner's rejections of Claims 1 – 22 are unfounded and should be reversed.

I hereby certify that this correspondence is being electronically submitted to the COMMISSIONER FOR PATENTS via EFS on April 16, 2008.

/Robert W. Holland/

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Respectfully submitted,

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